

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In re)	
)	
Third Periodic Review of the)	FCC 07-70
Commission's Rules and Policies)	MB Docket No. 07-91
Affecting the Conversion)	
To Digital Television)	

To: Commission

LATE FILED COMMENTS

1. Independent Communications, Inc. ("Independent"), licensee of Station KTTM-DT, Huron, South Dakota, Fac. Id. 28501, by its counsel, respectfully submits these comments to the Commission's Report and Order in the *Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television* proceeding¹ to provide for a revision to the proposed final DTV Table as set forth in Appendix B to the 7th R&O to include new specifications for the facilities listed for KTTM-DT. KTTM-DT is a satellite station of KTTW-DT, Sioux Falls, South Dakota, Fac. Id. 28521, which is also licensed to Independent. Independent desires to reduce the Effective Radiated Power ("ERP") and increase the Height Above Average Terrain ("HAAT") from the specifications set out in the DTV Table for KTTM-

¹ Notice of Proposed Rulemaking, FCC 07-70, MB Docket No. 07-91 (released May 18, 2007) (the "3rd Periodic NPRM"). Comments on the 3rd Periodic NPRM were due on August 15, 2007. Although these Comments are late filed, Independent submits them at the suggestion of the Commission staff to ensure that the Commission is provided with all of the necessary information to correct the DTV Table of Allotments (the "DTV Table"). Independent hereby requests leave to submit these Comments. Independent is submitting contemporaneously with these Comments a Petition for Reconsideration of the Seventh Report & Order in the Commission's *Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service* proceeding to accomplish the same goal as these Comments. See FCC 07-138, MB Docket 87-268 (released August 6, 2007) (the "7th R&O").

DT. Independent will submit an application to modify the facilities of KTTM-DT as proposed herein as soon as possible.

2. Change in Facilities of Station KTTM-DT. The Commission allocated an ERP of 11.8 kW and an HAAT of 217 m for Station KTTM-DT in the proposed final DTV Table. Independent wishes to operate KTTM-DT with an ERP of 8.5 kW and an HAAT 259 m. The height increase is necessary to enable KTTM-DT to reach a significant portion of its viewing audience. Although this represents an increase in HAAT from the value in the proposed final DTV Table, KTTM-DT's replication facilities have an HAAT of 259 m with a much larger ERP (979 kW for the replication facilities as opposed to the 8.5 kW that Independent is proposing now). Therefore, the new facilities would seem to be permissible and the DTV Table should be modified accordingly. A chart summarizing KTTM-DT's different authorizations and the specifications for the new facilities that KTTM-DT will operate with after the modification application is granted is attached as Attachment A.

3. Expiration of Construction Permit. Independent requests that the expiration of a new permit specifying the newly proposed facilities be extended to the end date of the DTV transition, February 19, 2009. This would provide Independent with a little over a year to completed construction of the new permanent facilities and still meet the deadline for digital broadcasting.

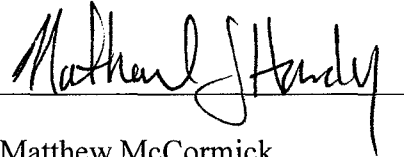
CONCLUSION

4. For the foregoing reasons, Independent requests that the Commission correct the DTV Table to specify KTTM-DT's new facilities at the new tower site as set forth in its.

Respectfully submitted,

INDEPENDENT COMMUNICATIONS, INC.

By:

A handwritten signature in black ink, appearing to read "Nathaniel J. Hardy", written over a horizontal line.

Matthew McCormick
Nathaniel J. Hardy
Its Counsel

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October 26, 2007

ATTACHMENT A

KTTM-DT Facilities

NTSC Channel: 12

DTV Channel: 22

Pre-Election Certification: Maximized Service Area, BPCDT-19991029ADD

Channel Election: Channel 12 (see BFRECT-2005118AFQ)

Authorization	File Number	Coordinates	ASR	HAAT	ERP	Area (sq km)	Pop. (thousand)
Original DTV Table (Replication)		44 11 39 098 19 05	1042456	259 m	979 kW	25081	78
Original DTV CP (Maximized)	BPCDT-19991029ADD, extended, expired 10/01/03	44 11 39 098 19 05	1042456	217 m	1000 kW	42880	157
STA	BDSTA-20030429ABT, extended, expires 11/18/07	44 11 39 098 19 05	1042456	104 m	1.14 kW	N/A	N/A
Final DTV Table	N/A	44 11 39 098 19 05	1042456	217	11.8 kW	19995	64
KTTM-TV New Facilities	BMPCDT-2007__	44 11 39 098 19 05	1042456	259	8.5 kW		

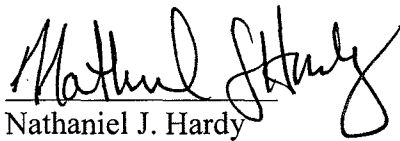
CERTIFICATE OF SERVICE

I, Nathaniel, hereby certify that on this 26th day of October 2007, copies of the foregoing Comments have been served by e-mail upon the following:

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